



Refrigerated Prepared Foods

2001 Butterfield Road
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Paul S. Halberstadt
Director,
Environmental Engineering

September 29, 2000

The Performance Track Information Center
Industrial Economics, Inc.
2067 Massachusetts Avenue
Cambridge, MA 02140

Subject: ConAgra Application
EPA Performance Track

Dear Julie Spyres:

Enclosed are 13 applications for multiple facilities within ConAgra for the EPA Performance Track. The facilities are the following:

- ✓ • ConAgra Beef Company, Grand Island, NE A07-0004
- ✓ • ConAgra Beef Company, Kersey, CO A08-0003 ✓
- ✓ • Swift & Company, Worthington, MN A05-0018 ✓
- ✓ • ConAgra Frozen Foods, Council Bluffs, IA A07-0005
- ✓ • Gilardi Foods, Troy, OH A05-0019 ✓
- ✓ • Gilardi Foods, Sidney, OH A05-0020 ✓
- ✓ • Gilroy Foods, Gilroy, CA A09-0013
- Gilroy Foods, Fernly, NV A09-0014
- Gilroy Foods, King City, CA A09-0015
- Gilroy Foods, Umatilla, OR A10-0005 (already processed no complete ✓ yet)
- ✓ • Armour Swift-Eckrich, Quincy, MI A05-0021 ✓
- ✓ • Butterball Turkey (Swift-Eckrich), Wallace, NC A04-0044 ✓
- ✓ • Swift, Eckrich, Wells, MN A05-0022 ✓

On behalf of the Sustainable Development Council of ConAgra we look forward to participating in this process to demonstrate that environmental and business needs can be successfully combined. If you have any questions, please call me at 630-512-1190.

Sincerely yours,

Paul S. Halberstadt
Director, Environmental Engineering

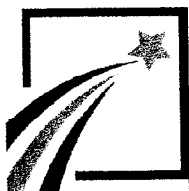
Attachments (13)

Cc: without attachments
Roger Holtorf - EPA
Phil James

Don Radentz
Alan Meyer

Robb Casseday
Terry Young

Tom Stachura
Robert Harris



***National
Environmental
Achievement Track***

Application Form

ConAgra Beef Company

Name of facility

ConAgra, Inc.

Name of parent company (if any)

PO Box 1876, Greeley, CO 80632

Street address

28625 US Highway 34

Street address (continued)

Kersey, CO 80644

City/State/Zip code

Give us information about your contact person for the
National Environmental Achievement Track Program.

Name Don Anderson

Title Feedlot Manager

Phone 970/356-2323

Fax 970/356-6070

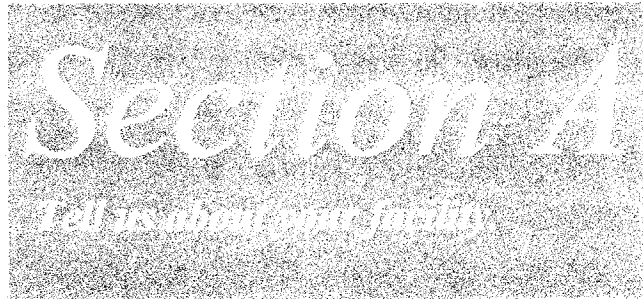
E-mail danderso@conagrabeef.com

Why do we need this information?

EPA needs background information on your facility to evaluate your application.

What do you need to do?

- Provide background information on your facility.
- Identify your environmental requirements.



1 What do you do or make at your facility?

Beef Cattle Feedlot

2 List the Standard Industrial Classification (SIC) code(s) or North American Industrial Classification System (NAICS) codes that you use to classify business at your facility.

SIC
0211

NAICS
112112

3 Does your company meet the Small Business Administration definition of a small business for your sector?

☐ Yes

☒ No

4 How many employees (full-time equivalents) currently work at your facility?

☐ Fewer than 50

☒ 50-99

☐ 100-499

☐ 500-1,000

☐ More than 1,000



5 Does your facility have an EPA ID number(s)?

☐ Yes

☒ No

If yes, list in the right-hand column.

6 Identify the environmental requirements that apply to your facility. Use the Environmental Requirements Checklist, at the back of the instructions, as a reference. List your requirements to the right *or* enclose a completed Checklist with your application.

See attached "Environmental Requirements Checklist"

7 Check the appropriate box in the right-hand column.

☐ I've listed the requirements above.

☒ I've enclosed the Checklist with my application.

8 Optional: Is there anything else you would like to tell us about your facility?

Capacity of Feedlot is 100,000 head of cattle

Why do we need this information?

Facilities must have an operating Environmental Management System (EMS) that meets certain requirements.

What do you need to do?

- Confirm that your EMS meets the Achievement Track requirements.
- Tell us if you have completed a self-assessment or have had a third-party assessment of your EMS.



1 Check **yes** if your EMS meets the requirements for each element below as defined in the instructions.

- | | |
|-----------------------------------|---|
| a. Environmental policy | <input checked="" type="checkbox"/> Yes |
| b. Planning | <input checked="" type="checkbox"/> Yes |
| c. Implementation and operation | <input checked="" type="checkbox"/> Yes |
| d. Checking and corrective action | <input checked="" type="checkbox"/> Yes |
| e. Management review | <input checked="" type="checkbox"/> Yes |

2 Have you completed at least one EMS cycle (plan-do-check-act)? ☒ Yes

3 Did this cycle include both an EMS and a compliance audit? ☒ Yes

4 Have you completed an objective self-assessment or third-party assessment of your EMS? ☒ Yes

If yes, what method of EMS assessment did you use?

☒ Self-assessment

☐ GEMI

☒ Other

☐ CEMP

Corporate Self-assessment

☐ Third-party assessment

☐ ISO 14001 Certification

☐ Other

Why do we need this information?

Facilities must show that they are committed to improving their environmental performance. This means that you can describe past achievements and will make future commitments.

What do you need to do?

Refer to the Environmental Performance Table in the instructions to answer questions 1 and 2.



- 1 Describe your past achievements for at least two environmental aspects. If you need more space than is provided, attach copies of this page.

Note to small facilities: If you qualify as a small facility as defined in the instructions, you are required to report past achievement for at least one environmental aspect.

First aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
Total Energy Use	193,968	MCF	135,012	MCF
<p>i. How is the current level an improvement over the previous level?</p> <p>30% reduction in annual natural gas usage</p> <p>ii. How did you achieve this improvement?</p> <p>Calculated the electrical generation process on site and transferred to the purchase of electricity from a public utility.</p>				

Second aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
Total Water Use	89	MM Gals	55	MM Gals
<p>i. How is the current level an improvement over the previous level?</p> <p>38% reduction in the amount of water pumped from wells during the period of November thru March (period of water tank overflows during freezing weather).</p>				
<p>ii. How did you achieve this improvement?</p> <p>Installation of 3 UV treatment/filter stations to recycle cattle drinking water.</p>				

- 2 Select at least four environmental aspects (no more than two from any one category) from the Environmental Performance Table in the instructions and then tell us about your future commitments. If you need more space than is provided, attach copies of this section.

Note to small facilities: If you are a small facility, you are required to make commitments for at least two environmental aspects in two different categories.

First aspect you've selected

a. What is the aspect?	Total Energy Use	
b. Is this aspect identified as significant in your EMS?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.	<input checked="" type="checkbox"/> Option A: Absolute value	135,012 MCF (Quantity/Units)
	<input type="checkbox"/> Option B: In terms of units of production or output	(Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

- ☒ Option A:
Absolute value 13,501 MCF
(Quantity/Units)
- ☐ Option B:
In terms of
units of production (Quantity/Units)
or output

e. How will you achieve this improvement?

By further eliminating on-site electric generation and evaluate other electrical distribution efficiencies.

Second aspect you've selected

a. What is the aspect?

Total Water Use

b. Is this aspect identified as significant in your EMS?

☒ Yes ☐ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

- ☒ Option A:
Absolute value 55 MM Gals
(Quantity/Units)
- ☐ Option B:
In terms of
units of production (Quantity/Units)
or output

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

- ☒ Option A:
Absolute value 8 MM Gals
(Quantity/Units)
- ☐ Option B:
In terms of
units of production (Quantity/Units)
or output

e. How will you achieve this improvement?

By adding another UV treatment site to reduce water usage during the 5 month period of water tank overflow. This will also reduce the amount of process wastewater generated by the site. That in turn will reduce the amount of water stored in the holding pond and then applied to land application.

Third aspect you've selected

a. What is the aspect?

Emissions of NOx

b. Is this aspect identified as significant in your EMS?

☒ Yes ☐ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A:
Absolute value 71.4 Tons
(Quantity/Units)

☐ Option B:
In terms of
units of production
or output (Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A:
Absolute value 7 Tons
(Quantity/Units)

☐ Option B:
In terms of
units of production
or output (Quantity/Units)

e. How will you achieve this improvement?

By further reducing electric generator use and evaluate other electrical distribution efficiencies.

Fourth aspect you've selected

a. What is the aspect?

Total Solid Waste

b. Is this aspect identified as significant in your EMS?

☒ Yes ☐ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A:
Absolute value 4,050 Tons
(Quantity/Units)

☐ Option B:
In terms of
units of production
or output (Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A:
Absolute value 0
(Quantity/Units)

☐ Option B:
In terms of
units of production
or output (Quantity/Units)

e. How will you achieve this improvement?

By removing the current application of feedlot manure on feedlot owned farm ground and establishing more off-site users at a cost to the feedlot, but at a reduction in waste materials on feedlot owned sites.

Why do we need this information?

Facilities must demonstrate their commitment to public outreach and performance reporting. You should have appropriate mechanisms in place to identify community concerns, to communicate with the public, and to provide information on your environmental performance.



What do you need to do?

- Describe your approach to public outreach.
- List three references who are familiar with your facility.

1 How do you identify and respond to community concerns?

Through the Colorado Livestock Association, the Colorado State Department of Health and Environment, through consultants, through our Corporate Environmental Operations office.

2 How do you inform community members of important matters that affect them?

Through the Colorado Livestock Association

3 How will you make the Achievement Track Annual Performance Report available to the public?

☒ Website www.conagra.com

☒ Newspaper

☐ Open Houses

☒ Other

Colorado Livestock Association Newspaper and Advertising.

- 4 Are there any ongoing citizen suits against your facility? ☐ Yes ☒ No

If yes, describe briefly in the right-hand column.

5 List references below

	<i>Organization</i>	<i>Name</i>	<i>Phone number</i>
<i>Representative of a Community/Citizen Group</i>	Colorado Livestock Association	Brad Anderson, CEO	303/238-3232
<i>State/Local Regulator</i>	Colorado State Department of Health and Environment	Kirk Mills	303/692-2977
<i>Other community/local reference</i>	EnviroStock, Inc.	Derald Lang, Exec. Dir.	303/238-3232

Section E

Application and Participation Statement

On behalf of ConAgra Beef Company
[my facility],

I certify that

- I have read and agree to the terms and conditions, as specified in the *National Environmental Achievement Track Program Description* and in the *Application Instructions*;
- I have personally examined and am familiar with the information contained in this Application (including, if attached, the Environmental Requirements Checklist). The information contained in this Application is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete, and I have no reason to believe the facility would not meet all program requirements;
- My facility has an environmental management system (EMS), as defined in the Achievement Track EMS requirements, including systems to maintain compliance with all applicable federal, state, tribal, and local environmental requirements, in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;
- My facility has conducted an objective assessment of its compliance with all applicable federal, state, tribal, and local environmental requirements, and the facility has corrected all identified instances of potential or actual noncompliance;
- Based on the foregoing compliance assessment and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Achievement Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior facility manager and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is applying to this program.

Signature/Date

 09/27/00

Printed Name/Title Don Anderson

Facility Name ConAgra Beef Company

Facility Street Address PO Box 1876, Greeley, CO 80632

Facility ID Numbers

The National Environmental Performance Track is a U.S. Environmental Protection Agency program. Please direct inquiries to 1-888-339-PTRK or e-mail ptrack@indecon.com. Mail completed applications to:

The Performance Track Information Center
c/o Industrial Economics Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140

National Environmental Achievement Track

Environmental Requirements Checklist

The following Checklist is provided to assist facilities in answering Section A, "Tell us about your facility," Question 6. The Checklist is given to help facilities identify the major federal, state, tribal, and local environmental requirements applicable at their facilities. The Checklist is not intended to be an exhaustive list of all environmental requirements that may be applicable at an individual facility.

If you use this Checklist and choose to submit it with your application, fill in your facility information below and enclose the completed Checklist with your application (see instructions).

Facility Name Conagra Beef Company
Facility Location: Kuner, Colorado
Facility ID Number(s): N/A
(attach additional sheets if necessary)

Air Pollution Regulations

Check All
That Apply

1. National Emission Standards for Hazardous Air Pollutants (40 CFR 61) ☐
2. Permits and Registration of Air Pollution Sources ☒
3. General Emission Standards, Prohibitions and Restrictions ☐
4. Control of Incinerators ☐
5. Process Industry Emission Standards ☐
6. Control of Fuel Burning Equipment ☐
7. Control of VOCs ☐
8. Sampling, Testing and Reporting ☒
9. Visible Emissions Standards ☐
10. Control of Fugitive Dust ☐
11. Toxic Air Pollutants Control ☐
12. Vehicle Emissions Inspections and Testing ☐

Other Federal, State, Tribal or Local Air Pollution Regulations Not Listed Above (identify)

13. ☐
14. ☐

Hazardous Waste Management Regulations

1. Identification and Listing of Hazardous Waste (40 CFR 261)
 - Characteristic Waste ☒
 - Listed Waste ☐
2. Standards Applicable to Generators of Hazardous Waste (40 CFR 262)
 - Manifesting ☐

- Pre-transport requirements ☐
- Record keeping/reporting ☐
- 3. Standards Applicable to Transporters of Hazardous Waste (40 CFR 263)
 - Transfer facility requirements ☐
 - Manifest system and record-keeping ☐
 - Hazardous waste discharges ☐
- 4. Standards for Owners and Operators of TSD Facilities (40 CFR 264)
 - General facility standards ☐
 - Preparedness and prevention ☐
 - Contingency plan and emergency procedures ☐
 - Manifest system, Record keeping and reporting ☐
 - Groundwater protection ☐
 - Financial requirements ☐
 - Use and management of containers ☐
 - Tanks ☐
 - Waste piles ☐
 - Land treatment ☐
 - Incinerators ☐
- 5. Interim Status Standards for TSD Owners and Operators (40 CFR 265) ☐
- 6. Interim Standards for Owners and Operators of New Hazardous Waste Land Disposal Facilities (40 CFR 267) ☐
- 7. Administered Permit Program (Part B) (40 CFR 270) ☐

Other Federal, State, Tribal or Local Hazardous Waste Management Regulations Not Listed Above (identify)

- 8. ☐
- 9. ☐

Hazardous Materials Management

- 1. Control of Pollution by Oil and Hazardous Substances (33 CFR 153) ☐
- 2. Designation of Reportable Quantities and Notification of Hazardous Materials Spill (40 CFR 302) ☒
- 3. Hazardous Materials Transportation Regulations (49 CFR 172-173) ☐
- 4. Worker Right-to-Know Regulations (29 CFR 1910.1200) ☒
- 5. Community Right-to-Know Regulations (40 CFR 350-372) ☒

Other Federal, State, Tribal or Local Hazardous Materials Management Regulations Not Listed Above (identify)

- 6. ☐
- 7. ☐

Solid Waste Management

- 1. Criteria for Classification of Solid Waste Disposal Facilities and Practices (40 CFR 257) ☐
- 2. Permit Requirements for Solid Waste Disposal Facilities ☐
- 3. Installation of Systems of Refuse Disposal ☐

4. Solid Waste Storage and Removal Requirements ☐
5. Disposal Requirements for Special Wastes ☐

Other Federal, State, Tribal or Local Solid Waste Management Regulations Not Listed Above (identify)

6. ☐
7. ☐

Water Pollution Control Requirements

1. Oil Spill Prevention Control and Countermeasures (SPCC) (40 CFR 112) ☒
2. Designation of Hazardous Substances (40 CFR 116) ☐
3. Determination of Reportable Quantities for Hazardous Substances (40 CFR 117) ☐
4. NPDES Permit Requirements (40 CFR 122) ☐
5. Toxic Pollutant Effluent Standards (40 CFR 129) ☐
6. General Pretreatment Regulations for Existing and New Sources (40 CFR 403) ☐
7. Organic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 414) ☐
8. Inorganic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 415) ☐
9. Plastics and Synthetics Point Source Effluent Guidelines and Standards (40 CFR 416) ☐
10. Water Quality Standards ☒
11. Effluent Limitations for Direct Dischargers ☐
12. Permit Monitoring/Reporting Requirements ☐
13. Classifications and Certifications of Operators and Superintendents of Industrial Wastewater Plants ☐
14. Collection, Handling, Processing of Sewage Sludge ☐
15. Oil Discharge Containment, Control and Cleanup ☒
16. Standards Applicable to Indirect Discharges (Pretreatment) ☐

Other Federal, State, Tribal or Local Water Pollution Control Regulations Not Listed Above (identify)

17. ☐
18. ☐

Drinking Water Regulations

1. Underground Injection and Control Regulations, Criteria and Standards (40 CFR 144, 146) ☐
2. National Primary Drinking Water Standards (40 CFR 141) ☐
3. Community Water Systems, Monitoring and Reporting Requirements (40 CFR 141) ☐
4. Permit Requirements for Appropriation/Use of Water from Surface or Subsurface Sources ☒
5. Underground Injection Control Requirements ☐

6. Monitoring, Reporting and Record keeping Requirements for Community Water Systems ☐

Other Federal, State, Tribal or Local Drinking Water Regulations Not Listed Above(identify)

7. ☐
8. ☐

Toxic Substances

1. Manufacture and Import of Chemicals, Record keeping and Reporting Requirements (40 CFR 704) ☐
2. Import and Export of Chemicals (40 CFR 707) ☐
3. Chemical Substances Inventory Reporting Requirements (40 CFR 710) ☐
4. Chemical Information Rules (40 CFR 712) ☐
5. Health and Safety Data Reporting (40 CFR 716) ☐
6. Pre-Manufacture Notifications (40 CFR 720) ☐
7. PCB Distribution Use, Storage and Disposal (40 CFR 761) ☐
8. Regulations on Use of Fully Halogenated Chlorofluoroalkanes (40 CFR 762) ☐
9. Storage and Disposal of Waste Material Containing TCDD (40 CFR 775) ☐

Other Federal, State, Tribal or Local Toxic Substances Regulations Not Listed Above (identify)

10. ☐
11. ☐

Pesticide Regulations

1. FIFRA Pesticide Use Classification (40 CFR 162) ☐
2. Procedures for Disposal and Storage of Pesticides and Containers (40 CFR 165) ☐
3. Certification of Pesticide Applications (40 CFR 171) ☐
4. Pesticide Licensing Requirements ☐
5. Labeling of Pesticides ☐
6. Pesticide Sales, Permits, Records, Application and Disposal Requirements ☐
7. Disposal of Pesticide Containers ☐
8. Restricted Use and Prohibited Pesticides ☐

Other Federal, State, Tribal or Local Pesticides Regulations Not Listed Above (identify)

9. ☐
10. ☐

Environmental Clean-Up, Restoration, Corrective Action

1. Comprehensive Environmental Response, Compensation and Liability Act (Superfund) (identify)

☐
☐

2. RCRA Corrective Action (identify)

☐
☐

**Other Federal, State, Tribal or Local Environmental Clean-Up, Restoration,
Corrective Action Regulations Not Listed Above (identify)**

3.

☐

4.

☐